



Infrastructure, environment, buildings

EPA Region 5 Records Ctr.



312186

Mr. Michael Wetzel  
Environmental Services Superintendent  
City of Kalamazoo  
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Kalamazoo, MI 49007

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Subject:

Groundwater Evaluation and Work Plan for Supplemental Investigation  
Allied Paper, Inc. Operable Unit, OU-1  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

ENVIRONMENTAL

Dear Mr. Wetzel:

ARCADIS, on behalf of Millennium Holdings, LLC (MHLLC), has provided the attached *Groundwater Evaluation and Work Plan for Supplemental Investigation* (Work Plan) for the Allied Paper, Inc. Operable Unit (Allied OU) to the United States Environmental Protection Agency (USEPA) for review and approval. At the request of USEPA, we are also providing three hard copies for your use. The Work Plan was developed as directed by USEPA to provide additional information to address concerns expressed by the City of Kalamazoo and others with respect to the potential for Allied OU-related constituents to migrate to the City's drinking water wells.

Date:

April 28, 2009

Contact:

Tim Scully-Granzeier

Phone:

312.263.6703

Our ref:

B0064587.0001.00004

During the community involvement process, which included two teleconferences in March 2009 and a meeting on April 14, 2009, various issues, concerns, and suggestions were raised by citizen organizations, the City of Kalamazoo, and the State of Michigan. This Work Plan has been modified from the draft Work Plan, dated March 6, 2009 to incorporate many of those suggestions and to address comments received from USEPA. The items below highlight some of the revisions made to the Work Plan as a result of the input received during the process.

- Characterization of the surficial flow regime to north and west of the Allied OU was expanded by adding Panelyte and Performance Paper wells to the well network.
- The graphical representation was improved to provide clarity.
- Additional Allied OU well clusters were included in the recommended evaluation activity.
- Tables and figures were provided indicating well gauging locations.
- Use of pressure transducers was evaluated, but was not included because historical well gauging activities provide a thorough assessment of water level/gradient variability over a longer time period than transducers can provide.

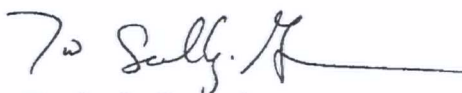
- Surveying of well casings was included.
- The desk-top review (Task 4) was initiated, identifying historical water level data, additional flow models, and potentially significant offsite sources.
- Additional City wells were researched and the geologic cross-section was expanded to include the Millwood Station wells south of the Allied OU.

The community involvement process included significant discussions regarding chemical analysis of inorganic constituents in groundwater on and beyond the Allied OU. Extensive groundwater investigation (including inorganics) has been completed at the Allied OU, as well as at neighboring sites. At this time, additional chemical analysis of groundwater is not recommended, pending collection of water levels and evaluation of groundwater flow paths. If the flow evaluation is inconclusive, additional measures will be evaluated to assess the potential for groundwater from the Allied OU to impact the City well field.

We thank you for your contributions in the development of this Work Plan and look forward to your continued participation. Please contact me if you have any questions or comments regarding this letter.

Sincerely,

ARCADIS



Tim Scully-Granzeier  
Project Manager

TSG/plf

Enclosures:

(1) *Groundwater Evaluation and Work Plan for Supplemental Investigation*

Copies:

Michael Berkoff, USEPA (without enclosure)  
James Saric, USEPA (without enclosure)  
Paul Bucholtz, MDEQ (without enclosure)  
Bruce Merchant, City of Kalamazoo  
Jeff Spoelstra, Kalamazoo River Watershed Council  
Jeff Keiser, CH2MHill (without enclosure)  
Stephen Weishar, MHLLC (without enclosure)  
Mike Erickson, ARCADIS (without enclosure)  
Lisa Coffey, ARCADIS (without enclosure)